

# EXHIBIT 25



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**VIA E-MAIL AND ELECTRONIC SERVICE**

Jeniphr A.E. Breckenridge  
Hagens Berman Sobol Shapiro LLP  
Suite 2900  
1301 Fifth Avenue  
Seattle, WA 98101

**Re: Electronic Search Terms for Montana AWP Action**

Dear Jeniphr:

Attached is our list of proposed search terms for Montana's search for responsive electronic documents. Our understanding is that these are very similar to the search terms that were agreed upon by all parties in the State of Connecticut AWP actions. As stated in our letter of December 16, we ask that the State begin by searching the emails of the current and former Medicaid employees whose depositions we have taken or noticed. Thank you.

Sincerely,

Charles Sipos

CS:rg  
Attachment

cc: Joseph P. Mazurek (by email)  
Counsel of record (by electronic service)

[06735-0059/SI.053530.138]

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**PROPOSED SEARCH TERMS FOR STATE OF MONTANA'S  
ELECTRONIC SEARCH**

**Company Names**

A search should be done for each of the company names identified in the Montana complaint.

**Subject Drugs**

A search should be done for each of the Subject Drugs identified in the Montana complaint.

**Terms Related to Reimbursement**

Medicaid & reimburs\*

Medicare & reimburs\*

“Medical assistance program” & reimburs\*

drug & reimburse\*

(physician or pharmac\* or provider) & reimburs\*

Medicaid & spread

Drug & spread

(OIG or “office of the inspector general”) & (Medicaid or “medical assistance program”)

(DOJ or “department of justice”) & (Medicaid or “medical assistance program”)

Dispens\* w/10 fee or cost

“Professional cost”

Reimburs\* & spread

Return w/3 practice

"Fee schedul\*"

**Terms Related to Pricing Benchmarks**

AWP or “average wholesale price”

WAC or “wholesale acquisition cost”

BP or “best price”

AAC or “actual acquisition cost”

AAC or “allowable acquisition cost”

AAP or “actual acquisition price”

ASP or “average sales price”

AMP or (average w/1 manufactur\* w/1 price)

DP or “direct price”

MAC or (maximum w/1 allow\* w/1 charge or cost)

FUL or “federal upper limit”

SUL or “State upper limit”

FAC or “Federal acquisition cost”

EAC or “estimated acquisition cost”

NWP or “net wholesale price”

WPP or “wholesale purchase price”

SLP or “suggested list price”

Usual w/2 customary w/2 cost or charge

(OIG or “office of the inspector general”) & AWP

(DOJ or “department of justice”) & AWP

**Terms Related to Claims Processing**

(Medicaid or “medical assistance program”) & claims & handling

ACS or "Affiliated Computer Services"

ACS & (Medicaid or "medical assistance program")

ACS & reimburs\*

Consultec

"First Health" & rebate\*

**Terms Related to Physician Administered Drugs**

"J code"

J-code

"J" w/2 code

injectable

injection

"oncology\*"

chemotherapy

physician w/2 administered

**Terms Related to Price/Market Share Reporting Services**

"First Data Bank" or "First Databank" or FDB

"Red Book" or Redbook

"Blue Book"

Medispan

IMS

Price Probe

"Facts & Comparisons"

"Master Drug Database" or MDDB

“Allen & Hansbury” or “Allen & Hanbury”

“Price Chek”

“Price Alert” or “PriceAlert”

**Miscellaneous Terms**

(RFP or “request for proposal”) & (Medicaid or “medical assistance program”)

Cardinal

McKesson

Mercer

“Myers & Stauffer”

NMPAAtalk@listbot.com

NAMFCU or “National Association of Medicaid Fraud Control Units”

NAAG or “National Association of Attorneys General”

NASMD or “National Association of State Medicaid Directors”

“Montana Pharmacy Association”

PTAG

NACDS or “National Association of Chain Drug Stores”

NCPA or “National Community Pharmacists Association”

HCFA & AWP

CMS & AWP

“benefit\* consultant”

“Mountain-Pacific Quality Health Foundation”

Ven-A-Care

“Adequate access”

“access to care”

“equal access”

sticker w/2 price

list w/2 price

drug & “state plan”

drug & rebate

drug & discount

drug & chargeback

"rural pharmacies"

"Jim Smith"

"Spectrum Medical"

**Additional Directions**

Every term where the word “drug” is used should also be searched for the word “pharmaceutical.”